

# **EXHIBIT I**

**BINGHAM**

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March 14, 2014

**Via E-Mail**

Robert H. Reckers  
Shook, Hardy & Bacon LLP  
JPMorgan Chase Tower  
600 Travis Street, Suite 3400  
Houston, TX 77002-2926

**Re: Oracle USA, Inc., et al. v. Rimini Street, Inc. and Seth Ravin,  
No. 2:10-cv-0106 LRH PAL (D.Nev.)**

Dear Rob:

I write in response to your March 10, 2013 letter concerning Oracle's demand that Rimini Street cease the business practices that the Court's February 13, 2014 Order determined constitute copyright infringement, and that Rimini provide critical information regarding its current practices. Your letter confirms the importance of Rimini's providing the information Oracle requests on a prompt schedule, and in a manner that allows Oracle to test assertions that Rimini makes.

First, as to the four listed categories of information you state that Rimini will provide (on the second and third pages of your letter), Oracle requests that Rimini provide that information within two weeks. Most of this information consists of lists that Rimini presumably has in its records anyway, e.g., the updated client list, the list of Rimini-hosted environments, the list of PeopleSoft updates created on any Rimini-hosted environment, and the list of clients that received updates generated on Rimini-hosted environments. There is no reason why Rimini cannot provide that information to Oracle promptly. The last category – information about Rimini's claimed environment migration project – relates to a project that you say is currently "underway" and that Rimini "is working diligently" on, so should be easy enough to describe.

Second, in light of the claims by Rimini publicly and in your letter, additional discovery on Rimini's purported new practices is necessary. This includes the collection and production of additional documents and likely additional depositions. Accordingly, Oracle requests that, within two weeks, Rimini identify and disclose those personnel whose job responsibilities involve, or who have

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knowledge about, the following topics, for purposes of selecting document custodians:

- The PeopleSoft, J.D. Edwards and Siebel environments that have been on Rimini's systems after the close of fact discovery, including which environments are still on Rimini's systems, and how Rimini uses these environments;
- Rimini migration of any PeopleSoft environment(s) off its systems to a customer's system;
- Any implemented or planned changes to Rimini's processes for development and testing of PeopleSoft updates since fact discovery has closed, including whether – and if so, how – Rimini plans to deliver PeopleSoft updates without cross-using environments or having local environments;
- The implementation and status of the environment migration project that you state Rimini is undertaking.

Depositions on these topics may be required, but in addition, we will need documents from the individuals involved so that we can test assertions that Rimini makes concerning its claimed changes to its business practices. In addition, Oracle requests non-custodial documents concerning the above topics.

Third, we should set a schedule for document production and depositions, so that this discovery may be finished expeditiously. Oracle proposes that once Rimini identifies the relevant custodians, Rimini produce custodial and non-custodial documents concerning the above subjects within a month. That timing may need to be adjusted depending on the number of custodians and the size of their likely productions. We would then plan to conduct depositions as soon as feasible after document production.

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Finally, as to the concluding paragraph in your letter, as soon as you provide Rimini's updated customer list, Oracle will conduct a reasonable search for relevant licenses for newly listed customers.

Sincerely yours,

  
Geoff M. Howard